

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-30032-MAP
)
 FRANCIS G. KEOUGH, III,)
 Defendant)
)

MOTION TO WITHDRAW

Now comes counsel for the Defendant, Francis Keough, and moves this Honorable Court to allow him to withdraw as counsel due to a conflict of interest.

The Government has moved on two occasions to disqualify counsel due to counsel's prior representation in an unrelated civil action of a witness and her family. The witness, according to the Government, will be a witness in Count I of the Second Superseding Indictment involving an alleged extortion in violation of Title 18, United States Code, Section 1951. The witness is also according to the Government, the primary witness in an obstruction of justice count which is expected according to the Government, to be returned as part of a Third Superseding Indictment.

Counsel has conferred at length with his client and the client understands the position counsel would be in relative to effective cross-examination of the witness. Defense counsel after serious consideration of all issues does not believe the

defendant would be properly served due to this conflict.

THE DEFENDANT
FRANCIS KEOUGH


By: 

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Dated: November 21, 2005

CERTIFICATE OF SERVICE

I, Jack F. St. Clair, Esq., hereby certify that I served a copy of the foregoing on the United States by hand delivering the same to William M. Welch, II, Assistant United States Attorney, 1500 Main Street, Springfield, MA, this 21st day of November, 2005.


JACK F. ST. CLAIR, ESQ.